IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

IN RE: MOTION FOR CIVIL CONTEMPT (BMC)	Civil Action No. 1:12-mc-00557-BMC Oral Argument Requested

NOTICE OF MOTIONS BY THE ASSOCIATED PRESS
TO INTERVENE AND UNSEAL

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, and upon all prior records and proceedings herein, Movant-Intervenor The Associated Press ("AP"), by and through its undersigned counsel, will move this Court, before the Honorable Brian M. Cogan U.S.D.J., in room 8C South of the United States Courthouse, located at 225 Cadman Plaza East, Brooklyn, NY 11201, on the 23rd day of March, 2016 at 9:30 a.m. or as soon thereafter as counsel can be heard, pursuant to Fed. R. Civ. P. 24 to intervene for the limited purposes of unsealing the Court's order(s) sealing the record in this civil action from public view, and the parties' submissions related thereto.

February 25, 2016

Respectfully submitted,

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